

INEOS ABS

INEOS ABS (USA) Corporation

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January 28, 2014

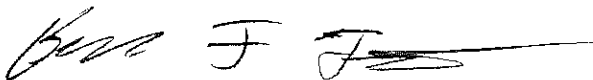
Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

RE: Consent Decree Civil Action No. 1:09-CV-545
Effective Date February 4, 2010

Dear Sirs:

Please find attached the Leak Detection and Repair Compliance Status Report for second Half 2013.
Please contact me at (513) 467-2184 or bradley.fattlar@ineos.com if you have any questions concerning the submitted information.

Respectfully Submitted,



Bradley Fattlar
Air Quality Engineer
INEOS ABS (USA) Corporation

cc: M. Palermo, USEPA Region 5
B. Weinburg, OEPA
G. Bachmann, Ohio AG
B. Pray (M. Kramer), SWOAQA

INEOS ABS (USA) CORPORATION'S ADDYSTON, OH PLANT

CONSENT DECREE COMPLIANCE STATUS REPORT

Consent Decree Civil Action No. 1:09-CV-545

Effective Date February 4, 2010

Reporting Period: 07/01/13 – 12/31/13

I. INTRODUCTION

The following report contains the required information about INEOS ABS' compliance activities associated with the requirements in Paragraph 35.a. through 35.h. in Appendix A of the Consent Decree.

II. COMPLIANCE REQUIREMENTS

Per Appendix A (Enhanced Leak Detection and Repair Program) of the Consent Decree, INEOS ABS met the following compliance requirements:

A. PERSONNEL REQUIREMENTS

1. Plant Personnel – The facility employs one full-time Leak Detection and Repair (LDAR) Monitoring Technician to perform all monitoring at the facility. In addition, we have an additional four technicians that are trained and can perform monitoring if the main technician is unavailable. The LDAR Administrator is not a full time position, but the engineer assigned to this position spends approximately one-third of their time on administrating the program. In March 2013 a technician assumed the LDAR Administrator responsibilities for the remainder of the first half and partly through 2014. LDAR repairs are assigned to the Maintenance work request database and prioritized. Recent past performance has shown that the number of employees assigned to the LDAR program is sufficient. Administrative controls have been implemented so that sufficient resources will be utilized if needed to ensure compliance with this program.
2. Contractors – Contractors may be used to assist in monitoring connectors at the facility and may be used to level peak work load. Contractors were not used in the 2013 calendar year.

B. NON-COMPLIANCE WITH APPENXIX A

Per Paragraph 50 b. of the Consent Decree, INEOS ABS submitted the following letters of noncompliance to the U.S. EPA and Ohio EPA:

1. Missed monitoring of DN3 connectors and difficult to monitor to components:

At the end of the 2013 calendar year 993 connectors and difficult to monitor components were not monitored on their annual frequency. This was due to the installation of a capital project. The unit was shutdown on August 30th and scheduled to come back up in mid-October. The project was delayed into the 2014 calendar year thus the required components to be measured annually but could not be monitored since the unit was not in operation by the end of the 2013 calendar year.

C. PROBLEMS ENCOUNTERED

No problems were encountered in complying with the requirements of Appendix A.

D. EQUIPMENT REPLACEMENT/IMPROVEMENT PROGRAM (ERIP)

Attachment #1 includes additional information on the ERIP, including each piece of equipment replaced or improved and the schedule for future replacements or upgrades. The information provided is for the second half of 2013.

E. COMMERCIAL UNAVAILABILITY OF CERTIFIED LOW-LEAKING VALVES/ PACKING TECHNOLOGY

Only certified low-leaking valves and certified low-leaking packing technology have been used during repairs/replacements of valves and/or packing materials.

F. LDAR TRAINING

Annual training was completed for all employees at the facility in November 2011. Refresher training was completed in October 2013. All contractors who performed LDAR activities are trained on LDAR requirements at the facility and are provided with a copy of Appendix A of the Consent Decree.

G. QUALITY ASSURANCE/QUALITY CONTROL (QA/QC) AUDITS

QA/QC audits were performed each quarter in 2013 and the following corrective actions were identified and addressed:

1. Third Quarter 2013
No Findings.
2. Fourth Quarter 2013
No Findings.

H. LDAR EXTERNAL AUDIT

The LDAR External Audit was completed on September 12, 2013 for Covered Process units P004 (DN1), P015 (DN3) and P048 (Scripset). Below is a summary of the results from the audit:

1. Comparative Monitoring Audit

The comparative monitoring leak ratios were below 3.0 for all components for all process units monitored. Therefore, no corrective actions were needed.

2. QA/QC Audit

The audit revealed no issues with monitoring at the assigned frequencies, Delay of Repair documentation, calibration procedures, or monitoring being performed in accordance with U.S. EPA Method 21. However, the following deficiencies were noted during the audit:

Open-Ended Lines (OELs): The audit found 8 OELs without control by cap, plug, blind, or properly closed double block valves. These OELs were found in the field review of units DN1, DN3, and Scripset.

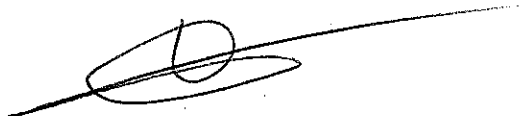
I. CORRECTIVE ACTION PLAN (CAP)

The CAP for the 2013 external audit was submitted to U.S. EPA for approval on 01/10/14. As explained in the submittal, the inspections will be completed in 2014.

II. CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'Eric Cassisa', with a long horizontal line extending to the right.

Eric Cassisa
Plant Manager, NAFTA
INEOS ABS (USA) Corporation

ATTACHMENT # 1
Equipment Replacement/Improvement Program

Consent Decree Civil Action No. 1:09-CV-545

Effective Date February 4, 2010

Reporting Period: 07/01/13 – 12/31/13

INEOS ABS - Addyston Plant
LDAR ERIP Outstanding Improvement

1/28/2013

Tag #	Process Unit	Component Description	Leak Detected	Replace/ Repack By Date
07099	DIN1	Refrigeration recycle tank	10/29/13	Next Maintenance Turn Around
11994	DIN1	AN filter system	10/04/13	Next Maintenance Turn Around
02058	DIN2	Recycle FCV	10/27/13	Next Maintenance Turn Around
01963	DIN2	Irganox in R2 feed tree	10/23/13	Next Maintenance Turn Around
00524	DN1	DN3 purge into spent monomer tank	11/22/13	Next Maintenance Turn Around
03816	DN1	Recycle to top of DV1 FM man outlet valve	11/27/13	Next Maintenance Turn Around

INEOS ABS - Addyston Plant

LDAR ERIP Outstanding Improvement

1/28/2014

Tag #	Process Unit	Component Description	Leak Detected	Date Replaced or Repacked
01051	Tank	EM BD Sphere Top	05/27/11	11/20/13
6012	Tank	EM BD Sphere Top	03/10/11	11/20/13
6025	Tank	EM BD R/C to sphere	03/17/11	11/20/13
01401	DIN1	AN Totalizer Inlet	09/18/13	11/13/13
02542	DIN1	DIN1 R1 Feed Tree	07/24/13	11/13/13
04441	EMUL	Valve-pressure gauge on water separator recirc line	11/29/12	11/20/13
08286	EMUL	Valve-Relief bypass valve at inlet side of filter	11/29/12	11/20/13
09037	EMUL	Water separator outlet valve to Bd storage tank	10/11/12	11/20/13
07981	DIN1/ TK Fm	C1 Recirculation inlet valve	03/06/12	11/26/2013
07984	DIN1/ Tk Fm	Valve-C1 Level indicator outlet valve	11/13/11	11/26/2013
11221	DIN1/ TK Fm	C1 Auto Valve on inlet side of transfer pump	03/06/12	11/26/2013
00605	DIN1/ TK Fm	Acrylonitrile tank manual inlet to transfer pump valve	05/24/13	11/26/2013
10483	DIN1/ TK FM	AN transfer line drain valve inside tunnel-south side at ground	08/25/12	12/4/2013

INEOS ABS - Addyston Plant
LDAR Leaker Replacements/Repackings -
Greater than 250 ppm Leak

1/26/2014

Tag #	Process Unit	Component Description	Leak Detected	Date Replaced	Date Repacked	Shutdown Req'd?	Replace/ Repack By Date	Comments
00826	DIN1	Outlet valve 30 building west pump	11/05/13	11/13/13		NO*	12/05/13	On Delay of Repair *Isolated from VOC service
06360	DIN1	R2 feed line Man valve to melt line	10/27/13	11/13/13		NO*	11/26/13	On Delay of Repair *Isolated from VOC service
02193	DIN2	Recycle to Recycle condenser	10/27/13	11/19/13		NO*	11/26/13	On Delay of Repair *Isolated from VOC service
00524	DN1	DN3 purge into spent monomer tank	11/20/13	11/22/13		NO	12/20/13	

INEOS ABS - Addyston Plant
LDAR Leaker Replacements/Repackings -
Between 100 ppm and 250 ppm Leak
October 1, 2013 - December 31, 2013

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Date Replaced	Date Repacked
07099	DIN1	Refrigeration recycle tank	10/29/13	142		
11994	DIN1	AN filter system	10/04/13	130		
02068	DIN2	Recycle FCV	10/27/13	211		
01963	DIN2	Irganox in R2 feed tree	10/23/13	120		
00524	DN1	DN3 purge into spent monomer tank	11/22/13	184		
03816	DN1	Recycle to top of DV1 FM man outlet valve	11/27/13	104		

INEOS ABS - Addyston Plant
LDAR Leaker Replacements/Repackings -
Between 100 ppm and 250 ppm Leak
July 1, 2013 - September 30, 2013

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Date Replaced	Date Repacked
01401	DIN1	Acrylonitrile Totalizer Inlet	09/18/13	105	11/13/13	
02542	DIN1	R-1 Feed Tank Purge to Vapor Line Man Valve	07/24/13	132	11/13/13	

INEOS ABS - Addyston Plant
LDAR Leaker Replacements/Repackings -
Between 100 ppm and 250 ppm Leak
October 1, 2012 - December 31, 2012

1/9/2013

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Date Replaced	Date Repacked
09037	EMUL	Water separator outlet valve to Bd storage tank	10/11/12	146	11/20/13	
04441	EMUL	Valve-pressure gauge on water separator recirc line	11/29/12	487	11/20/13	
08286	EMUL	Valve-Relief bypass valve at inlet side of filter	11/29/12	347	11/20/13	

INEOS ABS - Addyston Plant
LDAR Leaker Replacements/Repackings -
Between 100 ppm and 250 ppm Leak
July 1, 2012 - September 30, 2012

11/19/2012

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Date Replaced	Date Repacked
10483	DIN1/ TK FM	AN transfer line drain valve inside tunnel-south side at ground	08/25/12	183	12/04/13	
01051	DIN1/ TK FM	EM BD Sphere Top	08/23/12	4062	12/04/13	

INEOS ABS - Addyston Plant
LDAR Leaker Replacements/Repackings -
Between 100 ppm and 250 ppm Leak
January 1, 2012 - March 31, 2012

7/19/2012

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Date Replaced	Date Repacked
6025	EMUL/TK Fm	Bd unloading charge line to sphere drain valve south of dike wall	03/17/12	165	11/20/13	
07981	DIN1/TK Fm	C1 Recirculation inlet valve	03/06/12	123	11/26/13	
11221	DIN1/TK Fm	C1 Auto Valve on inlet side of transfer pump	03/06/12	106	11/26/13	

INEOS ABS - Addyston Plant
LDAR Leaker Replacements/Repackings -
Between 100 ppm and 250 ppm Leak
October 1, 2011 - December 31, 2011

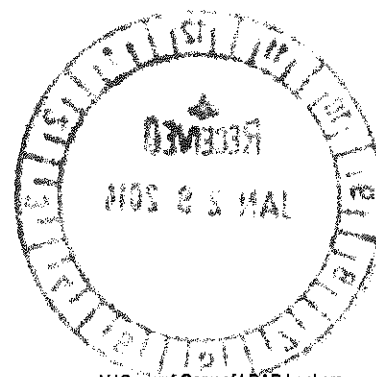
1/28/2014

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Date Replaced	Date Repacked
07984	DIN1/ Tk Fm	Valve-C1 Level indicator outlet valve	11/13/11	742	11/26/13	

INEOS ABS - Addyston Plant
LDAR Leaker Replacements/Repackings -
Between 100 ppm and 250 ppm Leak
February 4, 2010 - June 30, 2010

11/23/2011

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Calc. Conc.	Date Replaced	Date Repacked	Comments
01051	EMUL/TK FM	Bd Sphere (top) man vent viv	05/27/11	117	99	11/20/13		No improvement needed
6012	EMUL/TK FM	Autoblock on top of sphere to compressor house	03/10/11	126	107	11/20/13		



H:\Copy of Copy of LDAR Leakers